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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IMMIGRANT LEGAL RESOURCE CENTER;  
EAST BAY SANCTUARY COVENANT;  
COALITION FOR HUMANE IMMIGRANT  
RIGHTS; CATHOLIC LEGAL IMMIGRATION  
NETWORK, INC.; INTERNATIONAL  
RESCUE COMMITTEE; ONEAMERICA;  
ASIAN COUNSELING AND REFERRAL  
SERVICE; ILLINOIS COALITION FOR  
IMMIGRANT AND REFUGEE RIGHTS,

Plaintiffs,

v.

CHAD F. WOLF, *under the title of Acting  
Secretary of Homeland Security*; U.S.  
DEPARTMENT OF HOMELAND SECURITY;  
KENNETH T. CUCCINELLI, *under the title of  
Senior Official Performing the Duties of the  
Deputy Secretary of Homeland Security*; U.S.  
CITIZENSHIP & IMMIGRATION SERVICES

Defendants.

Case No. 4:20-cv-05883-JSW

**DECLARATION OF JESSE BLESS IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR SUPPLEMENTAL BRIEFING**

Assigned to Hon. Jeffrey S. White

Date: September 25, 2020  
Time: 9:00 a.m.  
Courtroom: 5, 2nd Floor

**JURY TRIAL DEMANDED**

**DECLARATION OF JESSE BLESS**

I, Jesse Bless, declare as follows:

1. I am an attorney licensed to practice law in all the courts of the State of Massachusetts, and have been admitted *pro hac vice* in this case. I am the Director of Federal Litigation for the American Immigrant Lawyers Association, counsel of record for Plaintiffs Immigrant Legal Resource Center (“ILRC”), East Bay Sanctuary Covenant (“EBSC”), Coalition for Humane Immigrant Rights (“CHIRLA”), Catholic Legal Immigration Network, Inc. (“CLINIC”), International Rescue Committee (“IRC”), OneAmerica, Asian Counseling and Referral Service (“ACRS”), and Illinois Coalition for Immigrant and Refugee Rights (“ICIRR”) in this case (collectively “Plaintiffs”). This declaration is submitted in support of Plaintiffs’ Civ. L.R. 7-11 Request for Supplemental Briefing. The facts set forth in this declaration are within my personal knowledge. If called as a witness, I could and would competently testify as follows.

2. On September 16, 2020, co-counsel and I contacted Defendants’ counsel for their position on Plaintiffs’ request for supplemental briefing, pursuant to Civ. L.R. 7-11.

3. On September 16, 2020, Defendants’ counsel stated they would not oppose Plaintiffs’ motion and the documents submitted therewith, provided they receive the opportunity to also provide supplemental briefing setting forth Defendants’ views as to the supplemental documentation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 16th day of September, 2020, at Boston, Massachusetts.

/s/ Jesse Bless  
Jesse Bless

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**ATTESTATION**

Pursuant to Local Civil Rule 5-1(i)(3), I hereby attest that all signatories listed above, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: September 16, 2020

/s/ Brian J. Stretch  
Brian J. Stretch